



Christopher Milito
(212) 735-8769
cmilito@morrisoncohen.com

February 23, 2024

BY E-FILING

Magistrate Judge Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *In re Application of Vale S.A., Vale Holdings B.V., et al.*,
Civil Action No. 1:20-mc-00199-JGK-OTW

Dear Judge Wang:

We write, as counsel to HFZ Capital Group LLC and affiliated entities (“HFZ”), regarding HFZ’s pending pre-motion conference letter seeking leave to file a motion for an order shifting HFZ’s expenses incurred in responding to the 27 subpoenas served by Vale S.A., Vale Holdings B.V., and Vale International S.A. (together “Vale”).

HFZ filed its pre-motion conference letter on February 17, 2023 and Vale filed a letter in opposition. ECF Nos. 157, 161. HFZ respectfully renews its request for leave to file its requested motion.

We remain available should the Court require anything further from HFZ.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Christopher Milito', with a stylized flourish at the end.

Christopher Milito